

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**HUNTINGTON DIVISION**

**UNITED STATES OF AMERICA**

v.

**Criminal No. 3:22-cr-00087**

**ALEX KAI TICK CHIN**

**DEFENDANT'S NOTICE TO THE GOVERNMENT  
CONCERNING THE NEED FOR THE  
GOVERNMENT'S FORENSIC EVIDENCE AT TRIAL**

Defendant, Alex Kai Tick Chin, by his counsel, notifies the Government of the need to have a unredacted copy of the forensic report of the defendant's Samsung Galaxy 9 smartphone available for counsel to use during cross-examination of the Government's witnesses and during closing arguments. This report was previously prepared by Leyland F. Pickering, a forensic computer analyst with Homeland Security Investigations. The February 3, 2023, Protective Order previously entered by this Court prohibits the defendant's counsel from having custody of any evidence, such as this report, which contains suspect images of child pornography as well as other images of Minor Female 1. Dkt. No. 38.

At trial, counsel would plan to utilize a laptop computer to project portions of the Government's forensic report through the courtroom's electronic courtroom system. Counsel intends to work out the logistics as to how this process would work with the Government in the near future.

Respectfully submitted this 6th day of March, 2023.

**ALEX KAI TICK CHIN**

**By Counsel**

**WESLEY P. PAGE  
FEDERAL PUBLIC DEFENDER**

**s/David R. Bungard**

David R. Bungard, Bar Number: 5739  
Assistant Federal Public Defender  
Office of the Federal Public Defender  
300 Virginia Street, East, Room 3400  
Charleston, West Virginia 25301  
Telephone: (304) 347-3350  
Facsimile: (304) 347-3356  
E-mail: david\_bungard@fd.org